

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NORTH CAROLINA
WESTERN DIVISION

Case No. 5:19-cv-00475-BO

- - - - -X

JASON WILLIAMS, :

Plaintiff, :

v. :

AT&T MOBILITY, LLC, :

Defendant. :

- - - - -X

CONFIDENTIAL - PURSUANT TO PROTECTIVE ORDER

Videoconference Video Deposition of

JASON A. WILLIAMS

(Taken by Defendant)

Charlotte, North Carolina

February 23, 2022

Reported by: Andrea Nobrega

Court Reporter

Notary Public

1 A. Yes.

2 Q. And what was the purpose of having
3 the burner phone from Verizon?

4 A. Just to have a second phone at
5 that point.

6 Q. Did you consider terminating your
7 AT&T service at that point in time?

8 A. I don't recall.

9 Q. On December 5, 2018, the last --
10 well, yeah, the last entry on JW 0040,
11 December 5, 2018, SIM swap, and then under
12 the notes it says after telling AT&T to
13 not issue a SIM card unless someone shows
14 up in the Raleigh North Hills store with
15 two passports, British and U.S., they
16 issued a new SIM card.

17 AT&T called the local PD on me.
18 We discussed the situation. They stated.
19 That's all that's on that page. We'll get
20 to the second page in a minute.

21 Let's talk about what happened.
22 It says they issued a new SIM card the end
23 of that first sentence. Did you suffer a
24 SIM swap on that date?

25 A. Yes.

1 MR. LAVIGNE: Objection. AT&T's
2 records are best evidence.

3 THE WITNESS: Yes. The answer is
4 yes, I was SIM swapped on December 5, 2018
5 again.

6 BY MS. STAGG:

7 **Q. And what were the circumstances of**
8 **that, do you recall, meaning where were**
9 **you, what occurred?**

10 A. Yeah, I don't know what December
11 5th was. It feels like a weekend, maybe a
12 Sunday. I can't recall exactly, but I
13 know it was nighttime when I went into the
14 AT&T store, and I was emphatic about the
15 persistent direct and specific information
16 we put in the computer about not to issue
17 new SIM cards unless I was in that Raleigh
18 North Hills store with two forms of ID, a
19 U.S. and British passport.

20 They continued to reissue SIM
21 cards and swap me. And I think the
22 specificity and intensity of the
23 discussion we were having, there was two
24 employees or so in the store, and next
25 thing I new two Raleigh police officers

1 showed up and asked me to step outside.

2 **Q. Okay. And why do you think AT&T**
3 **called the Raleigh Police Department?**

4 A. I'm sure when someone is saying
5 that they are a victim of crimes and there
6 is potential kidnapping and harm, it was
7 probably scary for them as it is for me,
8 and maybe they were trying to help me.

9 Maybe they were trying to protect
10 themselves. It's a frightening thing to
11 hear someone say the things that I was
12 saying. Imagine living it.

13 **Q. Okay. Do you recall who those**
14 **employees were that were at the store?**

15 A. No, but they were employees on
16 December 5, 2018. So you can probably go
17 and get the records and find out who they
18 were.

19 **Q. Had you ever met them before?**

20 A. I don't recall who they are or
21 their names or anything about them. They
22 are not friends or associates of mine in
23 any way, so I can't recall who they are.

24 **Q. Okay. In your prior**
25 **communications at AT&T stores, did you --**

1 let me ask it this way.

2 You had previously been to the
3 Raleigh North Hills store, is that
4 correct, before December 5th?

5 A. Yes, many times.

6 Q. And did you know any of the
7 employees that worked there?

8 A. No.

9 Q. Did you know the manager?

10 A. No.

11 Q. If I asked you today to tell me
12 the name of any of person at AT&T who you
13 spoke to who worked at the Raleigh North
14 Hills store, could you tell me that?

15 A. I may have gotten a name in some
16 of this and placed it in my report to you,
17 but I don't recall it at this time.

18 Q. Okay. Did you know any of those
19 people from any other part of your life?

20 MR. LAVIGNE: Objection, asked and
21 answered.

22 THE WITNESS: No.

23 BY MS. STAGG:

24 Q. Okay. If we go on to the next
25 page, JW 0041 of Exhibit No. 2, it says

1 they stated I should carry a gun. It
2 seems like AT&T finally taking this
3 seriously. This has cost me so much time
4 and money.

5 What did you mean by those
6 statements?

7 A. AT&T called the police on me. So
8 they must have been scared of what I was
9 saying. So that seemed like they were
10 taking something seriously, if not my
11 complaints, and the police officers that
12 met with me, we talked outside and they
13 asked me, man, this is serious, you should
14 probably carry a gun.

15 And again, you know -- yeah,
16 that's what happened.

17 Q. Did you already have a gun from
18 when the FBI told you to be concerned
19 about SWAT attacks?

20 A. I don't recall -- yes.

21 Q. Yes, you had acquired guns prior
22 to this date on December 5, 2018?

23 A. Yes.

24 Q. You say it seems like AT&T finally
25 taking this seriously. What did you mean

1 by that?

2 A. They called the police on me.

3 Q. Okay. Because of threats you were
4 making to them?

5 A. No, I have never --

6 MR. LAVIGNE: Objection,
7 argumentative.

8 MS. STAGG: Okay. Do you have any
9 understanding --

10 THE WITNESS: -- never in my life
11 has anyone called the police on me for any
12 communicated threats that I have ever made
13 against anyone, never in my life.

14 And at the store I was reasonable.
15 I was only showing them text messages and
16 information that -- or speaking to them in
17 a way that was saying, look, my life is in
18 danger because of the activity that's
19 going on in this store.

20 And I'm sure that maybe struck a
21 nerve with them, and they said, hey, we
22 don't know what's going on with this guy.
23 Let's call the police and let them sort it
24 out.

25 BY MS. STAGG:

1 Q. Okay.

2 A. That's only my interpretation of
3 this.

4 Q. Okay. Well, do you believe they
5 called the police on you to have you
6 arrested?

7 A. I don't know.

8 MR. LAVIGNE: Objection, asked and
9 answered, calls for speculation.

10 THE WITNESS: I don't know why
11 they called the police. Yeah, you have to
12 ask them. You could find out the names of
13 those employees because the date is there
14 that this happened, and you will have
15 record of who they are and you can ask
16 them.

17 BY MS. STAGG:

18 Q. Now, I noticed while we were
19 talking, you just picked up your phone and
20 looked at it. It looked like you were
21 sending a text or something.

22 A. No. It's the air conditioner.
23 It's the air conditioner. It's just very
24 cold.

25 Q. Got it, okay. Just double